

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of the Amateur Service	)	
Rules Governing Qualifying	)	WT Docket No. 12-283
Examination Systems and Other	)	
Matters	)	
	)	
Amendment of Part 97 of the	)	
Commission's Amateur Service Rules	)	RM-11629
to Give Permanent Credit for	)	
Examination Elements Passed	)	
	)	
Amendment of Part 97 of the	)	
Commission's Rules to Facilitate Use	)	
in the Amateur Radio Service of	)	RM-11625
Single Slot Time Division Multiple	)	
Access Telephony and Data Emissions	)	
	)	
Request for Temporary Waiver	)	
	)	
Amendment of the Amateur Service	)	
Rules Governing Vanity and Club	)	WT Docket No. 09-209
Station Call Signs	)	
	)	
	)	
	)	
	)	
By W. Lee McVey	)	
W6EM	)	
PG-12-19879	)	
	)	
	)	
To: The Chief, Wireless	)	
Telecommunications Bureau	)	
	)	

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## **REPLY TO THE COMMENTS OF JAMES EDWIN WHEDBEE**

The following is my Reply to the Comments of Mr. James Edwin Whedbee (Whedbee) filed in the above captioned proceedings. It is timely filed in accordance with 47C.F.R. §1.45, §1.415 and §1.41.

1. Whedbee makes several assumptions in his Comments that beg further discussion.

The style of Whedbee's submittal does not include numbered paragraphs, making reference to it difficult. But, where necessary, I will cite the numbered question response and the page number.

2. First, from his perspective, much knowledge necessary to properly construct, operate and maintain an amateur radio station is somehow subject to erasure from human memory over time.<sup>1</sup> And, much of older examination content is no longer relevant. Certainly, the majority of new amateur radio equipment does not utilize vacuum tubes, unless one includes stand-alone power amplifiers. (Many vacuum-tube amplifiers are currently manufactured and sold to amateurs) And, as has been said before, the physical aspects of radio theory, including propagation, antennas, and transmission lines haven't changed in decades. Some of the best texts on amateur antennas are ones last published twenty to sixty years ago.<sup>2</sup> Bipolar transistors and junction and metal-oxide field-effect

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<sup>1</sup> Whedbee Comments at Question 2 response, page 3.

<sup>2</sup> For example, *The Radio Handbook*, William Orr, W6SAI and *Radio Antenna Engineering*, Edmund Laport.

transistors were introduced and used in the 1960's. A mere 50 years ago or so. For example, Motorola, Inc. produced a widely-used hybrid two way radio in the mid 1960's that included both bipolar semiconductors and vacuum tubes.<sup>3</sup> Since that time, integrated circuits containing thousands of bipolar and field effect transistors have been conceived. Essentially, ICs can be taken as a "superior sardine cans," where many more fish can be stuffed therein when compared to individual preparation. As a history instructor, Whedbee must realize that one of the most important purposes of studying all types of recorded history is to avoid having to "reinvent the wheel." Radio engineering has a well-recorded, excellent history that is just as useful and just as relevant today as the day it was written.

3. Whedbee somehow discerns, from the Commission's pre-1987 Technician license decision with respect to Element 3 credit, that it had something to do with the 13-year time interval between then and 2000, when more restructuring occurred.<sup>4</sup> And, is close to the 10-year term and 2-year grace period of a license, a total of 12 years. Beginning in 1951, the Technician Class license required the identical Element 2 and Element 3 theory elements that the General Class did. This practice ended on March 20, 1987.<sup>5</sup> The only difference between the two license examinations before March 21, 1987, was the code speed. 5WPM for Technicians and 13WPM for Generals. On March 21, the Commission split Element 3 into 3A and 3B. The new Technician and later Technician-Plus only had to pass the equivalent of Elements 2 and 3A, now known just as Element 2,

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<sup>3</sup> The Motorola Motrac.

<sup>4</sup> Whedbee at Question 2 response, page 3.

<sup>5</sup> <http://www.w0ne.org/hamgram/pdf/hgjan00.pdf>

with or without the 5WPM. (The term Technician-Plus being coined for those who had passed the 5WPM requirement and March 21, 1987-and-later theory) On As of April 15, 2000, the code requirement for the General Class and Extra Class licenses was reduced to 5WPM. This Commission Order made the pre-March 21, 1987 Technician Class holders completely equivalent to General Class licensees.<sup>6</sup> However, according to Whedbee, the reason for 47CFR97.505(a)4 somehow has something to do with the Commission having reached a conclusion that coherent memory retention drops off after more than 12 years. Frankly, since credit has been and still is being awarded by the Commission for former Technician licensees over more than a 35 year span of eligibility, the Commission apparently considers *knowledge retention sufficient* in long-ago former licensees to again grant an Amateur Radio license without re-demonstration of proficiency.<sup>7</sup> Under his response to Question 3, Whedbee is concerned that “the burden is about to exceed the benefit” of allowing further credit.<sup>8</sup> If it isn’t alright to continue to offer credit to former Technician licensees, and not to extend the offer of 505(a)4 credit to Conditionals and Generals, then *how is it that he supports lifetime licensure?*<sup>9</sup> And, just what is this *burden*? The VEC fee paid to obtain credit for prior Element passage? Certainly an unnecessary, unjustified expense for former licensees not required to sit for an examination. Or, is it the ULS computer database entry to make it happen, amounting to about 98 percent applicant effort, and 2 percent Commission work?

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<sup>6</sup> See WT98-143, *Report and Order*, Released December 30, 1999

<sup>7</sup> The Commission should have, for consistency, also included any expired Conditional or General Class licensees with respect to Element 3 credit in its promulgation of 47CFR97.505(a)4. One of the major premises of the instant proceedings.

<sup>8</sup> Whedbee at Question 3, page 4.

<sup>9</sup> Id at Question 5, page 6.

The above Reply Comments are offered with the intent of assisting the Commission in these extensive rulemaking proceedings.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "W. Lee McVey".

W. Lee McVey  
3 Squires Glenn Lane  
Leeds, AL 35094-4564  
December 31, 2012

W6EM  
PG-12-19879

**Certificate of Service**

In accordance with 47CFR §1.47(g), this is meant to certify, under penalty of perjury, that I have served my Reply upon James Edwin Whedbee, by placing a true copy in the United States Mail, First Class postage-paid, to his address in the record of this proceeding, on this, the 31st day of December, 2012.

A handwritten signature in blue ink, appearing to read "W. Lee McVey".

W. Lee McVey